

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

This Document Relates to:

Claimant, Matthew Rahe
Claim Number: 85328

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Re: Doc. 27192

Hearing Date: December 12, 2024 at 1:00 P.M. ET

Objection Deadline: December 6, 2024 at 4:00 P.M. ET

**CLAIMANT 85328’S RESPONSE
IN OPPOSITION TO THE DEBTORS’ 129TH OMNIBUS OBJECTION**

Comes now, Matthew Rahe, Claimant 85328 (hereinafter “Claimant” or “Claimant 85328”), and herein submits his response to the Debtors’ 129th Omnibus Objection. In the 129th Omnibus Objection, the Debtor objected to the Claimant’s Proof of Claim, stating that after “Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the Claimant.” *See* Schedule 1 to Debtors’ 129th Omnibus Objection (Doc. No. 27192-2) at p. 14.

However, contrary to the Debtors’ claim that no records exist establishing an entitlement, the FTX Customer Claims Portal shows that Claimant has a “Total Customer Entitlement Claim” of in the amount of \$3,843.72 (USD). Exhibit A – Declaration of Daniel J. Thornburgh. Moreover, the screenshot of the FTX Claims Portal (attached as an exhibit to Exhibit A) shows that the Claimant held the following cryptocurrency on the FTX platform at the time of the bankruptcy:

Portfolio Main Account

Total Customer Entitlement Claim **\$3,843.72 USD**

Balances Tab Customer Entitlement Claim \$3,843.72 USD

Positions Tab Customer Entitlement Claim \$0.00 USD

Balances Deposits Withdrawals Positions Fills P2P Transfers Airdrops Ref >

Balances

☒ Show Quantities ☐ Show USD

Coin		All Subaccounts Balance	Subaccount Balance
USD	USD	3,618.33	3,618.33
Dogecoin	DOGE	2,718.77730906	1,992.63741284
Ethereum (Proof of Work)	ETHW	0.03114555	0.03114555

Rows per page: 15 1-3 / 3 < >

Core Transactions

Transactions will be downloaded for the user's main account or the currently selected subaccount. This download may not include additional balance adjustments. Please download these using the adjustments tab.

Download

By applying the cryptocurrency values from the Conversion Table that was approved by the Court, it is the Claimant's position that he is entitled to \$3,904.47 (USD), as set forth below:

- USD - $\$3688.33 \times \$1.0 = \$3,688.33$
- Dogecoin – $2788 \times \$0.082 = \222.94
- ETH – $0.0311455 \times \$1,258.84 = \39.20

Total USD Value: \$3,950.47

As such, we respectfully request that the Debtor modify the Claimant's claim and agree that his "Total Customer Entitlement Claim" is \$3,950.47, based on the Debtor's own records which are located on the FTX Customer Claim's Portal.

Wherefore, Claimant 85328 respectfully moves for an order modifying his entitlement to \$3,950.47 (USD).

Dated: 12/6/24

Respectfully submitted,

By:

/s/ Deirdre M. Richards

Deirdre M. Richards (#4191)

ELLIOTT GREENLEAF PC

1105 N. Market Street, Suite 1700

Wilmington, DE 19801

Phone: (302) 384-9400

Fax: (302) 384-9399

Cell: (610) 322-1532

-and-

Daniel J. Thornburgh (*pro hac vice* pending)

Aylstock, Witkin, Kreis

& Overholtz, PLLC

17 East Main Street, Suite 200

Pensacola, FL 32502

Telephone: 850-202-1010

Fax: 850-916-7449

dthornburgh@awkolaw.com

Counsel for Matthew Rahe, Claimant 85328